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Pro Se 5 (Rev. 12/16) Complaint for a Civil Case violation of Freedom Of Information Act

2024 JAN 22 AM 11:40

UNITED STATES DISTRICT COURT

for the

District of

Division

Kahli Constant

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Commonwealth Of Massachusetts

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No. _____

(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☐ Yes ☒ No**COMPLAINT FOR A CIVIL The Freedom of Information Act,
(5 U.S.C. § 552.)****I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Kahli Constant</u>
Street Address	<u>9 Hannon St Unit 2</u>
City and County	<u>Boston, Suffolk</u>
State and Zip Code	<u>Massachusetts, 02124</u>
Telephone Number	<u>9786481872</u>
E-mail Address	<u>kahlx97@gmail.com</u>

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title *(if known)*. Attach additional pages if needed.

Defendant No. 1

Name	Michael A. Cox
Job or Title <i>(if known)</i>	commissioner
Street Address	1 Schroeder Plaza
City and County	suffolk county, Boston, MA 02120
State and Zip Code	Massachusetts, 02120
Telephone Number	617-343-4633
E-mail Address <i>(if known)</i>	

Defendant No. 2

Name	State Police
Job or Title <i>(if known)</i>	Lt. Col.Christopher Mason
Street Address	250 Leverett cir, Boston
City and County	Brighton, Suffolk
State and Zip Code	Massachusetts, 02114
Telephone Number	617-727-4812
E-mail Address <i>(if known)</i>	

Defendant No. 3

Name	Continuum Of Care Bridge over Troubled Waters
Job or Title <i>(if known)</i>	Executive Director Elizabeth Jackson
Street Address	12 channel st 9th floor
City and County	Boston, Suffolk
State and Zip Code	Ma, 02110
Telephone Number	617-635-3880
E-mail Address <i>(if known)</i>	

Defendant No. 4

Name	Roca Inc
Job or Title <i>(if known)</i>	Vice regional President
Street Address	60 new Market Square

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City and County	<u>Boston, Suffolk</u>
State and Zip Code	<u>massachusetts, 02118</u>
Telephone Number	<u>617-874-7350</u>
E-mail Address (if known)	<u></u>

II. Basis for Jurisdiction

may Federal courts are courts of limited jurisdiction (limited power). Under 5 U.S.C. § 552 federal courts hear cases in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000. In that kind of case, called a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff. Explain how these jurisdictional requirements have been met.

A. The Plaintiff(s)

1. If the plaintiff is an individual

The plaintiff, (name) kahli Constant, is a citizen of the
State of (name) massachusetts.

2. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated
under the laws of the State of (name) _____,
and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

B. The Defendant(s)

1. If the defendant is an individual

The defendant, (name) Tha Thai, is a citizen of
the State of (name) Commonwealth Of. Or is a citizen of
Massachusetts
(foreign nation) Commonwealth Of Massachusetts.

2. If the defendant is a corporation

The defendant, (name) Lt. Col. Christopher Mason, is incorporated under
the laws of the State of (name) massachusetts, and has its
principal place of business in the State of (name) massachusetts.
Or is incorporated under the laws of (foreign nation) Commonwealth of Massachusetts.

and has its principal place of business in (name) Commonwealth Of Massachusetts

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

C. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

this is owed due to the professional error that caused a community professional innocent members to be targets of security threat groups and or law enforcement to conduct unlawful actions 1 million dollars per party in punitive and monetary damages and economic psychiatric damages relevant to case allegations and circumstances of any active or prior investigations with Caregiving Unite LLC or any representing on behalf of The Founder Of Caregiving United LLC.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

On (date)	11/27/20	, at (place)	complaint filed with attorney general's office location of
	23		incident 9 hannon st boston ma 02124. all reports filed since
	9/03/2023		2021 police reports. 12/29/23. 12/13/2023 no professional
	12/13/2023		feedback given preponderance standard met from attorney
	12/27/23		general's office. 9/03/23 filed a complaint to the attorney
	12/29/23		general's office with no response or corrective mediation
	8/1/17		communication. 1/1/24; 11.5 request for advocacy to internal
	8/31/2023		affairs no prompt non disclosure 5 u.s code sections 552a (b)
			conditions of disclosure.

the defendant(s): (1) performed acts that a person of ordinary prudence in the same or similar circumstances would not have done; or (2) failed to perform acts that a person of ordinary prudence would have done under the same or similar circumstances because *(describe the acts or failures to act and why they were negligent)*

by commonwealth attorney general's office representatives and law enforcement threats investigation and falsified reports and hate crime 2.) M.G.L.C 140 sections 121 amended by st.2017, c. 110.sections 18-20 amended by st. 2018 c.123 sections 1-7, effective july 3 2018 evidentiary finding of alleged victims firearm was incorrectly found inoperable self defense claim. 3. 8/1/17 erred in trial and appeal ruling finding of identification procedure false statement procured to grand jury admissible information sought by the alleged victim and roommates. All parties refused to provide adequate services in regards to contractual and company policy and constitutional obligations which led to police investigations and attorney general's office investigations that were not 4. unusually professionally communicated to party impacted conducted in error. Years of emails, and police reports given inferences that gave probable cause to investigators. Along with the attorney general's office, no police report communicated resolution as well of the disclosure of results. 5. reason to believe discriminatory police practice and state police practice given criminal record. 6. wrongful convictions relief sought

The acts or omissions caused or contributed to the cause of the plaintiff's injuries by *explain*

because I was unaware of the communities and data of how many citizens were procuring false defamatory information, which created an image that changed the public consensus and caused racial profiling and wrongful conduct everywhere i was living. community psychosis and loss realization with the acts by law enforcement and residents where i resided in the youth homeless shelter and in emergency housing in dorchester ma. Caused serious targeting of my young friends and mom economically and socially.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

i request the courts to allow me to be able to defend myself given our self defense statutes and any evidence procured to you, to be able to adhere to mt citizen rights and religious rights to be able as an executive health care agent with my company to protect my company and clients kids and youth with an issued license to carry identification and fid card so that i can protect my business and my life i've been in numerous situations where i was not able to defend my self using equal or less force in no escape situations. I've worked collaboratively and corroborated to all law enforcement officials and internal affairs and the attorney general's office to no avail and was shot at from close range and there was corruption even still I was unarmed. punitive and monetary damages 1,000,000, per negligent claim discriminatory claim in regards to all parties upon review and disclosure of records demand letter request to be admitted and accepted for mental rehabilitative economic treatment and mental and emotional restructure consistent with company's functions of Caregiving United LLC. No more interference by any third parties of either party's affiliates with the company's operation of essential duties.

V. Certification and Closing

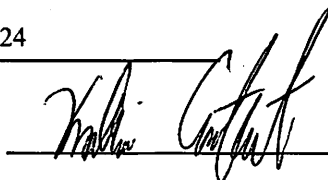
Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 1/18/2024

Signature of Plaintiff



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Printed Name of Plaintiff Kahli Constant

B. For Attorneys

Date of signing: _____

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Street Address _____

State and Zip Code _____

Telephone Number _____

E-mail Address _____